

REMARKS

At the outset, Applicants gratefully note the Examiner's indication that claims 8-11 contain allowable subject matter, his acknowledgment of receipt of the foreign priority papers, and his indication that the documents listed in the Information Disclosure Statements filed June 7, 1999, and May 30, 2000, have been considered.

Prior to the present response, claims 1-25 were pending. By way of the above amendments, claims 7, 8, 14-15 and 20-25 have been amended, and claims 26-29 have been added. Accordingly, claims 1-29 are currently pending. Favorable reconsideration is respectfully requested.

Claims 20 and 24 have been amended to recite that the operation registered in the memory provided in the camera corresponds to an operation of the computer activated by a manipulation device of the computer. Claims 21 and 24 have been rewritten in independent form to include features of their respective parent claims and to recite that the registered operation includes a display of a dialog on the display of the camera and on a display of the computer. Support for the amendments to claims 20, 21, 23 and 24 can be found in pages 15-28 of the specification and in Figures 7-15. Claims 22 and 25 have been rewritten in independent form to include all the features of their respective parent claims.

Claims 14 and 15 were objected to for containing minor informalities. In response, claims 14 and 15 have been amended according to the Examiner's suggestions on page 2 of the Office Action. It is believed that the changes made to claims 14 and 15 fully address the concerns noted on page 2 of the Office Action.

Claims 8-11 were rejected as allegedly being indefinite for not providing sufficient antecedent basis for "said display" in line 4 of claim 8. Applicants respectfully submit that claim 8, as amended, and hence also dependent claims 9-11, fully comply with 35 U.S.C. Section 112. As such, Applicants request that the rejection of claims 8-11 be withdrawn.

The Office Action includes a rejection of claims 1, 5, 7, 15 and 20-25 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,111,662 to *Satoh et al.* (hereinafter, "*Satoh*"). This rejection is respectfully traversed.

Claim 1 is directed to a camera system comprising a camera for photographing an object and acquiring image data of the object, a computer connectable to the camera, a manipulation member provided to the camera, and a camera controller provided to the camera for detecting an operation of the manipulation member and transmitting a signal based on the detected results to said computer. Claim 1 further recites that a controller is provided in the computer for controlling a screen of a display functioning together with the computer based on the signal received from the camera.

In the claimed invention, a controller provided to a computer receives a signal from the camera, which results from a detection of an operation of a camera manipulation member, and *controls* a screen of a display functioning together with the computer based on the received signal. For instance, in the exemplary camera system shown in Figs. 8(a) and 8(b) and described in pages 18-19 of the specification, when pressing a function key F2 of the camera, the camera controller 211 calls contents registered in the memory of the camera 211a. Based on the called contents, the personal computer 1000 is activated to display the dialog on the screen 1001 of the personal computer 1000 for specifying a folder of the computer. Other ways to control the screen of the computer include, for example, manipulating a trackball TR of the camera, which causes the mouse cursor displayed on the screen of the computer to move in a synchronized manner with one displayed on the camera display screen. (See the specification, page 18, lines 1-5.) As demonstrated in these examples, the screen of the computer is controlled based on a signal transmitted by the camera controller to the computer after the camera controller detects a manipulation of a manipulation member of the camera. It is respectfully submitted that the *Satoh* patent does not disclose a combination including a controller for controlling of a screen of a computer display, in the context in which this feature is recited in claim 1.

The Examiner, citing column 24, lines 15-21 and column 25, lines 31-34 of *Satoh*, asserts that a controller in the PC 122 controls a screen of a display functioning together with the computer because the PC 122 allegedly displays "CAMERA" (See, the Office Action, page 4.) It is respectfully submitted, however, that the *Satoh* patent does not disclose any display of "CAMERA" on a display of the PC 122. The cited portion of the

Satoh patent describes “CAMERA” as being an acknowledgment or confirmation signal sent to a PC 126 via a modem 125 connected to the PC 126. (See, *Satoh*, column 23, lines 24-26; column 24, lines 15-16; and column 25, lines 31-32.) There is simply no disclosure in *Satoh* that the confirmation signal “CAMERA” is displayed on a display of a computer. Moreover, *Satoh* does not mention anything with regard a controller of the PC 122 *controlling a screen of a display functioning together with the computer* based on this “CAMERA” signal.

The Examiner also cites *Satoh*’s description in column 28, lines 7-11, of the PC 122 receiving and displaying image file directory as allegedly providing disclosure of *a controller provided in the computer for controlling a screen of a display functioning together with the computer based on the signal received from the camera*. However, the cited portion of *Satoh* describes “control” of the camera 120 from the side of the PC 122. (See column 27, line 33 to column 28, line 7.) There is no mention in the relied upon part of *Satoh* of *controlling a screen of a display* functioning together with the computer based on a signal received from the camera, and that the received signal results from any *detection of an operation of a manipulation member of the camera*, as set forth in claim 1. To the contrary, *Satoh* discloses that the camera 120 receives a command from the PC 122 for sending directory data from the card (see *Satoh*, Fig. 55A, item 2) and that the camera responds by transmitting these data. Hence, the signal transmitted from *Satoh*’s camera 120 is not a signal based on the detected results of an operation of a manipulation member of the camera.

Furthermore, control of the PC display screen in *Satoh* appears to be carried out by the PC itself. This is different from the claimed “controlling a screen of a display ... based on the signal received from said camera.” That is, mere disclosure in *Satoh* of sending of directory information data to the PC 122 does not mean that the screen of the PC is *controlled* based on the directory data received by the PC because the control of displaying the data appears to lie completely within the control of the PC. Indeed, the PC 122 commands the camera to send these data. The camera 120 responds by sending “the number of bytes data of maximum number K byte directory data and directory data”

(See *Satoh*, Fig. 60 and column 28, line 43-55.) There is no teaching or suggestion in *Satoh* that these transmitted data control the screen of the PC display.

For at least the above reasons, the combination of every feature recited in claim 1 is not disclosed in the *Satoh* patent. As such, the rejection is improper and should be withdrawn.

Independent claim 7 is directed to a camera system including, *inter alia*, a camera, a computer connectable to the camera, an image display for the camera, and a controller provided to the computer for detecting a connection of the camera to the computer and transmitting display data stored in the computer to the camera based on the detected results. In the Office Action, the Examiner asserts that *Satoh's* disclosure of the PC 122 transmitting a command signal to the camera allegedly meets the recited controller of claim 7. It is respectfully submitted that the description relied upon in *Satoh* for providing support for this allegation (i.e., column 23, line 55 to column 24, line 38, and in column 29, lines 1-9) does not disclose the specific combination of features set forth in claim 7.

First, with respect to a PC "command," column 23, line 55 to column 24, line 38 of *Satoh* states the following: "In the state of the DSC 120 with the POWER switch 114a turned on, the external I/F is set by a command from the PC to be ready for data reception by an interruption from the system controller 110." This cited portion of *Satoh* does not disclose or imply the claimed controller for transmitting *display data stored in the computer*, to a camera based on a detection of a connection of the camera and the computer.

Second, according to column 29, lines 1-9 of *Satoh*, the PC 122 transmits a command to the camera 120 and the camera responds by sending comment data to the PC 122. It is respectfully submitted that this disclosure regarding comment transmission is neither relevant to the "*display data stored in the computer*," nor does it teach transmission of display data in the context in which this feature is recited in claim 7. Moreover, *Satoh* discloses that "[t]hese processes are executed after a file designation command." (See, *Satoh*, column 29, lines 8-9.) Because designation of a file in the camera by the computer would occur when the PC 122 is already connected to the camera 120, the processes

involving comment transmission do not appear to be based on any result of a controller *detecting a connection of the camera to the computer*, as claimed.

Claim 7 further recites that the camera is provided with a controller for *controlling a screen of an image display* provided to the camera based on *the display data* received from the computer. The Examiner asserts that these features are disclosed by *Satoh's* description of a "modem switch process," at column 25, lines 6-39. However, this description in *Satoh* concerns the camera 120 receiving a carrier detection signal CD and an acknowledgment signal ACK. It is respectfully submitted that these CD and ACK signals used to confirm a communication connection cannot reasonably be considered "display data" as claimed.

For at least the above reasons, claim 7 is believed patentably distinguishable over the *Satoh* patent. Independent claim 15 is directed to a camera that similarly recites subject matter not disclosed in the *Satoh* patent. For instance, claim 15 recites a combination that includes, *inter alia*, a camera controller which receives display data from the computer connected to said connector and *controls a screen of said image display* based on the received *display data*. For reasons pointed out above with respect to claim 7, *Satoh* does not disclose this feature.

Applicants' claim 5 is directed to a computer program product that executes the steps of receiving a signal transmitted by a camera connected to a computer and displaying a folder for storing image data transmitted from the camera on a display functioning together with the computer, based on the signal. The Examiner asserts that the *Satoh* patent, in Figs. 70-71 and column 30, lines 1-28, allegedly teaches the claimed step of displaying a folder for storing image data transmitted from the camera. It is respectfully submitted, however, that the *Satoh* patent does not teach this feature because the cited portion of *Satoh* describes processes for file movement *within* the camera memory card. (See also, column 30, line 29 to column 31, line 33.) (Also note the lack of communication from the DSC to the PC in Figs. 74 and 76.) Hence, *Satoh* does not disclose display of a folder for storing image data transmitted *from the camera* on a display of a computer as claimed. For at least this reason, the rejection is improper and should be withdrawn.

With respect to independent claims 20 and 23, as amended, it is respectfully submitted that the disclosed imaging apparatus of the *Satoh* patent does not include the recited a camera having a memory registering an operation for the computer which corresponds to an operation activated by a manipulation device of the computer, such as a keyboard, a mouse and so on, and a manipulation member of the camera which calls a registered content from the memory and specifies the operation to activate the corresponding operation based on the registered content when the manipulation member is operated. For instance, the *Satoh* patent does not disclose that any of the switches identified by the Examiner (i.e., switches 114a-114f and 311a-311f respectively shown in Figs. 39 and 117, and trigger switch 119 shown in Fig 35) calls a registered content from the camera memory and specifies an operation for the computer corresponding to one activated by a manipulation device of the camera. The camera of *Satoh* including switches 311a-311f does not have any interface for connecting a computer to this camera. (See, *Satoh*, Fig. 116 and column 47, line 1 to column 48, line 30.) With respect to the switches 119 and 114a-114f, it is respectfully submitted that the disclosure in *Satoh* relied upon for support (i.e., column 23, lines 30-44, line 55 to column 24, line 38) does not disclose the combination of specific features recited in claims 20 and 23.

Claim 21 has been rewritten in independent form to include features of original claim 20 and to recite that the registered operation includes display of dialog pertaining to the transfer on a display of the camera and a display functioning together with the computer. While the *Satoh* patent discloses that camera 120 includes a "trigger switch process" that is operated by depressing a switch 119 for transmitting image data, *Satoh* does not describe any particulars of this subroutine that would disclose display of dialog pertaining to the data transfer on the display of camera and on a display functioning together with the computer. (See, *Satoh*, column 24, line 58 to column 25, line 2.) Claim 24, as amended, similarly recites a novel combination of features not described or suggested in the *Satoh* patent. The *Satoh* patent therefore fails to anticipate claims 21 and 24 because it does not disclose all the features of these claims.

With respect to dependent claims 22 and 25, Applicants have rewritten these claims in independent form so as to include all the features of their respective original parent claims 20 and 23. Each of these claims state, *inter alia*, that a camera includes a memory for registering an operation to specify a folder for transferring image data to the computer. The Examiner asserts that the *Satoh* patent allegedly “teaches that the operation is to specify a folder for transferring the image data to said computer (col. 28 lines 40-67).” (See, the Office Action, page 7, lines 9-10, and page 8, lines 6-7.) Applicants dispute any allegation that the portion of *Satoh* cited in the Office Action discloses specifying a folder as claimed. In contrast, column 28, lines 40-67 of the *Satoh* patent discloses a way of moving files *within* the camera memory from the side of the PC 122. There is neither explicit nor implied disclosure in the relied on portion of *Satoh* of a camera memory registering any operation to specify a folder for transferring image data *to the computer*. The *Satoh* patent, in fact, does not discuss folders of the computer, much less specifying one of these folders. It is therefore submitted that *Satoh* does not disclose the claimed combinations including these features.

For at least the above reasons, the *Satoh* patent does not anticipate claims 1, 5, 7, 15 and 20-25 because it fails to disclose each and every recited feature. Applicants therefore request that the rejection of these claims under Section 102 be withdrawn.

The Office Action includes a rejection of claims 2-4, 6 and 19 under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Satoh* in view of U.S. Patent No. 6,191,807 to *Hamada et al.* (hereinafter, “*Hamada*”). This rejection is respectfully traversed.

As noted above, the *Satoh* patent does not teach or suggest the camera controller of claim 1. The Examiner asserts that it would have been obvious to modify the system of *Satoh* with a teaching in the *Hamada* patent of pointing a cursor to specify a folder for transferring image data from one television telephone apparatus to another apparatus. The Examiner alleges that such modification would allow a manipulation member to specify a folder for transferring image data to the computer so as to allow a group of image files to be transferred at one time. It is respectfully submitted, however, that one of ordinary skill in the art would not have been led to the combination as proposed by the Examiner, and

further that the *Hamada* patent does not remedy the above-noted shortcomings of the *Satoh* patent.

Contrary to the Examiner's assertion, Applicants submit that the *Hamada* patent is not "in the same field of endeavor" as the electronic imaging apparatus device of the *Satoh*. It is further submitted that *Hamada* is not analogous prior art with respect to the present invention. The *Hamada* patent discloses a television telephone apparatus 20 that includes a television camera 27 for picking up image input, a microphone 28 for receiving voice input, a display unit 24, a CPU 21 for controlling the apparatus, an image and voice compander unit 25 for compressing an input image from the camera 27 and input voice information from the microphone and a voice output unit 35. (See, *Hamada*, column 3, lines 39-63.) *Hamada* is mainly concerned with text or image file transfer between the memory units (i.e., memory 23) of television telephone apparatuses. According to *Hamada*, when a television telephone apparatuses 20 is connected with another apparatus 30, a display unit 24 of each television telephone apparatus includes either an image display area displaying an image from the camera 27 of another connected telephone apparatus (i.e., areas 31, 35, and 39 as shown in Figs. 3, 7, 9), or a "shared window" 312 common to each connected terminal (see, *Hamada*, Figs. 12A, 12B, 13, 21A, 21B, 22, 30 and 31). Each display unit 24 also displays file icons of files stored in the a memory unit 23 of the apparatus. To transfer a file represented by one of the file icons, the user initiates a "drag-and-drop" operation using a mouse to deposit a file icon in the area of the image display area or in the shared window. However, *Hamada* does not disclose that the displayed files of the memory 23 have any relationship with the televised images provided on the terminal display by camera 27. Indeed, the type of camera used in the *Hamada* system appears to provide only a "live" image for one or more other partners communicating with the user's apparatus. The *Hamada* patent does not appear relevant to the camera and camera system of the present invention because *Hamada* is not concerned with the problems addressed by the present invention, such as easing confusion that can arise with the different user interfaces of a computer, transfer of data between a camera and a computer connected to the camera, or control of the computer via a user interface of the camera.

Even if one were to consider, for the sake of argument, that one of ordinary skill in the art would have been motivated to somehow combine *Satoh* and *Hamada*, this hypothetical combination would not teach or suggest each and every recited feature of the claims. For instance, the *Hamada* patent fails to teach or suggest any manipulation device whatsoever in connection with the camera 27. It follows, therefore, that *Hamada* does not teach or suggest controlling a screen of a display functioning together with a computer based on a signal received from the camera, and that the signal is based on a camera controller detecting an operation of a manipulation member of the camera, as set forth in claim 1, or a manipulation member which calls a registered content from a memory provided in a camera, as set forth in claims 20-25. With respect to claim 5, *Hamada* does not teach displaying a folder for storing image data transmitted *from a camera*. The *Hamada* patent does not teach or suggest a controller provided to a computer for detecting a connection of the camera and computer and transmitting display data stored in the computer *to the camera* based on the detected results, as recited in claim 7, and a camera controller provided to a camera for controlling a screen of the camera based on received display data, as recited in claims 7 and 15. For at least these reasons, the Examiner has not established a *prima facie* case of obviousness because the proposed combination of *Satoh* and *Hamada* fails to teach the combination of all the features recited in independent claims 1, 5, 7, 15 and 20-25.

Claims 2-4, 6 12-14 and 19 each depend from one of independent claims 1, 5, 7, 15 and are therefore patentable for at least the reasons set forth above. In addition, these claims define additional combinations of features that are neither disclosed nor suggested by the applied references. It should be noted that claim 19 was rejected in the Section 103 rejection involving the combination of the *Satoh* and *Hamada* patents. However, claim 19 depends from claim 18, and claim 18 is not mentioned in the rejection including claim 19. Hence, the rejection of claim 19 is improper for this reason alone.

The Office Action includes a rejection of claims 16-18 under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Satoh* in view of U.S. Patent No. 6,201,571 to *Ota* (hereinafter, "*Ota*"). This rejection is respectfully traversed.

Claims 16-18 depend from independent claim 15, which recites a camera controller for receiving display data from a computer connected to the camera, and for controlling a screen of an image display of the camera based on the received display data. As pointed out above, the *Satoh* patent fails to disclose each and every one of these features of claim 15. The Office Action asserts that it would have been obvious to modify *Satoh* to meet the specific features set forth in claims 16-18. It is respectfully submitted, however, that the *Ota* patent does not teach or suggest the above-noted shortcomings of the *Satoh* patent.

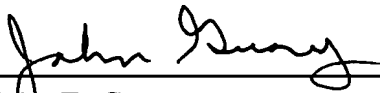
The *Ota* patent teaches a digital camera which performs reduction processing on an image stored in a frame memory 7 of the camera. After creating the reduced image in a reduction processing section 10 and a synthesis processing section 32, the reduced image data is stored in a recording medium 13. (See, *Ota*, column 7, lines 12-37.) When the camera is connected with a computer, the reduced image 33 may be accessed for simultaneous display with other reduced images (i.e., "thumbnail" images) on the display screen of the computer. In contrast to what is recited in claim 15, the *Ota* patent does not mention or suggest that a computer sends display data to the camera controller. Furthermore, the only apparent disclosure in *Ota* of a camera image display (i.e., display panel 50) (see, column 10, line 1 to column 11, line 14) does not mention anything with regard a controller of the camera controlling the camera display screen *based on display data received from a computer*. Hence, the *Ota* patent does not remedy of the deficiencies of the *Satoh* patent. As such, claim 15 is patentable over *Satoh* and *Ota*, whether taken alone or in any combination, because no *prima facie* case has been established.

Dependent claims 16-18 are allowable at least for the same reasons given for claim 15, and for the further points of distinction defined by the additional recited features.

For at least the foregoing reasons, Applicants respectfully submit that the present patent application is in condition for allowance, and prompt indication thereof is earnestly solicited.

Respectfully submitted,

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